

Applicant's new arguments to distinguish Trokhan et al. may have been overlooked. Applicant will thus summarize the previous arguments and then address the amendment to Claim 1 that further distinguishes the reference.

Trokhan et al. disclose a single lamina comprising a dewatering felt composed of a batt of natural or synthetic fibers joined, such as by needling, to a support structured formed of woven filaments (Column 7, lines 38-40). The dewatering felt has a web patterning layer joined to a web facing surface of the felt. The web patterning layer preferably comprises a photosensitive resin deposited on the web facing surface of the felt so that a portion of the patterning layer penetrates the web facing surface and is bonded thereto by radiation curing (Column 7, lines 16-20).

Unlike the reference, Applicant's papermaking belt of Claims 1-3 and 5-8 comprises a laminate of two separate laminae joined in a face-to-face relationship. The first lamina comprises a "woven fabric reinforcing structure" and a patterned framework. (Also see Figure 2 and page 9, lines 21-25.) The second lamina comprises a secondary base with a batting joined thereto. (See page 12, lines 3-5 of the specification.)

The Examiner contends that Figure 2 of the Trokhan et al. patent discloses a reinforcing structure 240 with a patterned framework 250 disposed thereon, and that components 240 and 250 comprise a first lamina, with batt 240 reinforcing the patterned framework 250.

Applicant respectfully disagrees with such an interpretation of Figure 2. According to Column 7, lines 37-40 of the Trokhan et al. patent, item 240 of Figure 2 is a batt of natural or synthetic fibers joined, such as by needling, to a support structure 244 formed of woven filaments. There is no disclosure that the batt 240 is a reinforcing structure for the patterned framework. Instead, the woven filaments 244 are said to be the support structure for the belt. Felt layer 220 of the reference comprising batt 240 and filaments 244 would thus correspond to the second lamina of the present invention, leaving no separate woven fabric reinforcing structure for the web patterning layer in a first lamina, as required by Applicant's claims. Moreover, there is no disclosure in the Trokhan et al. patent that components 240 and 250 comprise a first lamina of a two laminae belt, as suggested by the Examiner. The Trokhan et al. belt is simply not a laminate of two separate laminae, as required by the present invention.

Claim 1 has also been amended to specify that the reinforcing structure is a woven fabric reinforcing structure. Element 240 of Figure 2 of Trokhan et al. is a batt of natural or synthetic fiber. Even if it could be construed as a reinforcing structure as suggested by the Examiner, there is no suggestion of the addition of a woven fabric reinforcing structure for the patterned framework, as required herein. As noted on page 10, lines 9-11, Applicant's reinforcing structure 23 prevents fibers

from passing completely through the deflection conduits, thereby reducing the occurrences of pinholes. Clearly, the Trokhan et al. patent does not disclose a woven fabric reinforcing structure for a patterned framework in a first lamina. Accordingly, the patent does not teach every element of the Applicant's claimed invention. Reconsideration and withdrawal of the rejection of Claims 1-3 and 5-8 under 35 U.S.C. 102(b) is thus requested.

Claims 9, 11-18, and 20-25 have been rejected under 35 U.S.C. 103 as being unpatentable over the Trokhan et al. U.S. Patent 5,556,509 patent in view of U.S. Patent 5,624,790, Trokhan et al. Applicant's response dated March 30, 2000 to the final rejection included new arguments to distinguish the cited art. The arguments are repeated for the Examiner's convenience, along with additional reasons for patentability.

Claims 9 and 11-15 are directed to a papermaking belt comprising two lamina joined together in face-to-face relationship to form a unitary laminate. The first lamina comprises interwoven yarns. The second lamina is a dewatering felt composed of a secondary base with nonwoven batting joined thereto.

Claims 16-18 and 20-21 are directed to a papermaking belt comprising two lamina wherein the first lamina comprises two layers. The first layer is composed of woven yarns forming discrete imprinting knuckles and the second layer comprises a patterned framework disposed on the first layer. The second lamina is a dewatering felt composed of a secondary base with nonwoven batting joined thereto.

Claims 22-24 are directed to the papermaking belt according to Claim 1, wherein the reinforcing structure has a specific caliper, air permeability, and shed, respectively. Claim 25 is directed to a belt of Claim 3 further defining the patterned framework.

As previously explained, the Trokhan et al. '509 patent discloses a single lamina papermaking belt comprising a dewatering felt with a web patterning layer disposed on the web contacting surface of the felt. The Trokhan et al. '790 patent discloses a backside textured papermaking belt comprising a reinforcing structure and a patterned framework on a web contacting surface of the belt. The patterned frameworks on the web contacting surfaces of the belts disclosed in each of the two references produce structured paper.

(1) The '509 patent neither discloses nor provides the necessary 'motivation' to combine a single lamina dewatering felt in a face-to-face relationship with a second lamina to form a laminate, much less combine the dewatering felt of the '509 patent with a second lamina comprising a backside textured papermaking belt such as in the '790 patent. As explained above, the web patterning layer on the single lamina dewatering felt of the '509 patent produces structured paper. Consequently, there is no

motivation to combine the dewatering felt of the '509 patent with the backside textured belt of the '790 patent in order to make use of the patterned framework on the belt to produce structured paper.

The Examiner contends that there is clear motivation to combine the reinforcing layer of the '790 patent with the dewatering felt of the '509 patent. Reference is made to Column 12, lines 55-65 and Column 15, lines 33-36 of the '790 patent as providing support for such motivation.

Column 12, lines 55-65 and Column 15, lines 33-36 of the secondary reference discuss increasing the strength and extending belt life. The papermaking belt disclosed is an endless belt which travels around a loop which includes a means for applying fluid pressure differential to a paper web such as a vacuum pickup shoe. The loop also includes a blow-through air predryer for drying the paper web (Column 10, lines 49-52). The papermaking process described in the '790 patent and the papermaking belt disclosed therein apply to blow-through air drying papermaking processes, which typically do not include dewatering felts. One skilled in the art would know that dewatering felts are used in conventional papermaking processes. Consequently there would be no motivation to combine the through-air-drying papermaking belt disclosed in the '790 patent with the conventional dewatering felt disclosed in the '509 patent. Even combining these references, one still does not obtain Applicant's invention of a laminate belt as claimed herein. Accordingly, Applicant's claims are patentable over the cited references.

In view of the above amendments and remarks, withdrawal of the rejections and allowance of all claims are requested.

Respectfully submitted,

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